

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GREAT WESTERN INSURANCE CO.,	:	
	:	
Plaintiff,	:	
	:	Civil action no. 1:18-cv-06249
v.	:	VSB-SN
	:	
MARK GRAHAM, <i>et al.</i> ,	:	
	:	
Defendants.	:	

**NOTICE OF MOTION TO DISMISS BY JOHN DRAKE
PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 12(b)(2)**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of John Drake in Support of Joint Motion to Dismiss by Defendants John Drake and Edward Brendan Lynch, and the Joint Memorandum of Law in Support of Motions to Dismiss for Lack of Personal Jurisdiction Over Defendants Drake and Lynch, Defendant John Drake respectfully moves this Court to dismiss as to him Great Western Insurance Company's First Amended Complaint in the above-captioned matter, pursuant to Federal Rule of Civil Procedure 12(b)(2).

Dated: New York, New York
November 21, 2018

LAW OFFICES OF THOMAS C. MOORE, P.C.



By: Thomas C. Moore
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For Defendant John Drake